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7 Attorneys for Defendant  
 8 SMITH'S FOOD & DRUG CENTERS, INC.

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 VERDETTE PAGE, an individual,

12 Plaintiff,

13 vs.

14 THE KROGER CO., a foreign corporation;  
 15 SMITH'S FOOD & DRUG CENTERS, INC.,  
 a foreign corporation; DOE & ROE  
 16 MAINTENANCE EMPLOYEES; DOE &  
 ROE MAINTENANCE COMPANIES; DOE &  
 17 ROE EMPLOYEES; DOE & ROE  
 EMPLOYERS; DOE OWNERS I-V; ROE  
 OWNERS I-V; ROE EMPLOYERS I-V;  
 18 DOES I-V; and ROE COMPANIES I-V,  
 inclusive

19 Defendants.

Case No. 2:24-cv-01658-CDS-NJK

**STIPULATION AND ORDER TO  
 EXTEND TIME TO FILE JOINT PRE-  
 TRIAL ORDER**

**[SECOND REQUEST]**

20 **WHEREAS** Plaintiff VERDETTE PAGE (hereinafter "Plaintiff") and Defendant SMITH'S  
 21 FOOD & DRUG CENTERS, INC. (hereinafter "SMITH'S"), by and through their respective counsel of  
 record as undersigned, are presently working together to draft the Joint Pre-Trial Order;

22  
 23 **WHEREAS** the present deadline for the Parties to file the Joint Pre-Trial Order is set for May  
 16, 2025;

24  
 25 **WHEREAS** the Parties have met and conferred in good faith regarding additional damages  
 disclosed by Plaintiff and are presently determining the need for motion practice regarding same.  
 26 Specifically, on May 6, 2025, the undersigned counsel for SMITH'S addressed the issues in this motion  
 27 by telephone with the undersigned counsel for Plaintiff. Through counsel, the Parties agreed that this  
 28

1 motion does not involve a “discovery dispute,” and, therefore, does not require the “meet and confer”  
 2 certification required by Local Rule 26-6(c). Counsel further agreed that, because this Motion does not  
 3 involve a “discovery dispute,” it should be heard in the first instance by the US District Court Judge,  
 4 consistent with Local Rule 26-6(a); and

5 **WHEREAS** the Parties have agreed to a brief extension to file the Joint Pre-Trial Order:

6 **IT IS HEREBY STIPULATED AND AGREED** by and between Plaintiff and SMITH'S, by  
 7 and through their respective counsel of record, that the deadline for filing the Joint Pre-Trial Order  
 8 pursuant to Local Rules 16-3(b) and 26-3 shall be extended by thirty-one (31) days, or until June 16,  
 9 2025, to allow the Parties to thoughtfully discuss the contents thereof and submit same to this Court.

10 **IT IS SO STIPULATED.**

11 Respectfully submitted to this Court on May 16, 2025.

12 **ERIC BLANK INJURY ATTORNEYS**

13 /s/ *Eric R. Blank*

14 ERIC R. BLANK, ESQ.  
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**COOPER LEVISON, P.A.**

/s/ *Pooja Kumar*

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 Smith's Food & Drug Centers, Inc.

22 **ORDER**

23 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that the Parties shall have until  
 24 June 16, 2025, to file the Joint Pre-Trial Order. **NO FURTHER EXTENSIONS OF THIS**  
**DEADLINE WILL BE GRANTED.**

25 **IT IS SO ORDERED.**

26   
 27 **UNITED STATES MAGISTRATE JUDGE**

28 **DATE:** May 19, 2025